

**IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA**

The State of Missouri, *et al.*,

*Plaintiffs,*

v.

President Joseph R. Biden, Jr., in his official  
capacity as President of the United States of  
America, *et. al.*,

*Defendants.*

Civil Action No. 22-cv-1213

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO THE  
FIRST AMENDED COMPLAINT**

Federal Defendants respectfully request a two-week extension of the deadline to respond to Plaintiffs' First Amended Complaint, ECF No. 45. Plaintiffs do not oppose this motion. There is good cause for this request, as explained below.

Plaintiff States commenced this action on May 5, 2022. Compl., ECF No. 1. On August 2, 2022, the States filed an Amended Complaint, adding Individual Plaintiffs and several new Federal Defendants and asserting additional allegations. First Am. Compl., ECF No. 45. The Federal Defendants' response to the Amended Complaint is due by August 16, 2022. *See* Fed. R. Civ. Pr. 15(a)(3).

At the same time, the Court has ordered expedited discovery, Order, ECF No. 34, which is consuming significant time and resources of the Federal Defendants. Pursuant to the Court's Order, on July 18, 2022, Plaintiff States served on Federal Defendants various interrogatories and requests for production. Federal Defendants' objections and responses are due by August 17, 2022, *id.* at 14, and Defendants have been working diligently to meet that deadline. Within ten

days following service of objections and responses, the parties must meet and confer over any discovery disputes and then submit a joint statement to the Court detailing any remaining discovery disputes. *Id.* Meeting these deadlines will impair Federal Defendants' ability to respond to the First Amended Complaint by August 16, 2022.

Accordingly, Federal Defendants respectfully request an additional two weeks—or until August 30, 2022—to file a response to the First Amended Complaint. A proposed order is attached.

Dated: August 8, 2022

Respectfully submitted,

BRIAN M. BOYNTON  
Principal Deputy Assistant Attorney General

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/s/ Kyla Snow  
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#### **CERTIFICATE OF CONFERENCE**

In accordance with the Local Rules of this Court, counsel for Defendants contacted Plaintiffs' counsel to request consent for the filing and granting of this motion. Plaintiffs' counsel informed counsel for Defendants that Plaintiffs do not oppose this motion.

/s/ Kyla Snow